

STATE OF MICHIGAN
IN THE UNITED STATES DISTRICT COURT

DARRYL PELICHET, and
BONN WASHINGTON,

Plaintiffs,

Case No. 18-11385
Honorable Paul D. Borman

v.

NICK LYON, individually,
LISA MEDOFF, individually,
MARY CLAIRE SOLKY, individually
LAURIE ALBERT, individually,
HANUMAIAH BANDLA, individually,
CHARLES STERN, individually,
ARUNA BAVINENI, individually,
SHARON DODD-KIMMEY, individually,
CRAIG LEMMEN, individually,
KIMBERLY KULP-OSTERLAND,
individually,
LISA MARQUIS, individually,
MARTHA SMITH,
DAVE BARRY, individually,
KELLI SCHAEFER, individually,
JOE CORSO, individually,
DIANE HEISEL, individually,
HEGIRA PROGRAMS, INC.,
CARELINK NETWORK, INC., and
MICHIGAN DEPARTMENT OF
HEALTH AND HUMAN SERVICES,

Defendants.

LAURENCE H. MARGOLIS (P69635)
Margolis Law, PC
Attorney for Plaintiff
214 South Main Street, Suite 202
Ann Arbor, MI 48104
(734) 994-9590
Email: Larry@lawinann Arbor.com

JAMES M. GALLAGHER (P73038)
James Gallagher PLLC
Attorney for Plaintiffs
214 S. Main St., Ste. 202
Ann Arbor, MI 48104
(734) 274-5090
jgallagher@jamesgallagherlaw.com

LOREN BLUM (P38557)
Law Offices of Christine Greig
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
(248)-223-0120
Fax: 603-334-9174
Loren.Blum@LibertyMutual.com

**DEFENDANT HEGIRA PROGRAMS, INC.'S APPEARANCE AND NOTICE OF
ENTRY OF APPEARANCE**

TO: CLERK OF THE COURT

Please enter our Appearance as Attorneys for Defendant, Hegira Programs, Inc. in the above-entitled cause.

TO: ATTORNEYS OF RECORD:

Please take notice that we have entered our Appearance as Attorneys for Defendant, Hegira Programs, Inc. in the above entitled cause of action.

Law Offices of Christine Greig

/s/ Loren Blum

BY: LOREN BLUM (P38557)
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
Loren.Blum@LibertyMutual.com
248-223-0120

Dated: June 6, 2018

STATE OF MICHIGAN
IN THE UNITED STATES DISTRICT COURT

DARRYL PELICHET, and
BONN WASHINGTON,

Plaintiffs,

Case No. 18-11385
Honorable Paul D. Borman

v.

NICK LYON, individually,
LISA MEDOFF, individually,
MARY CLAIRE SOLKY, individually
LAURIE ALBERT, individually,
HANUMAIAH BANDLA, individually,
CHARLES STERN, individually,
ARUNA BAVINENI, individually,
SHARON DODD-KIMMEY, individually,
CRAIG LEMMEN, individually,
KIMBERLY KULP-OSTERLAND,
individually,
LISA MARQUIS, individually,
MARTHA SMITH,
DAVE BARRY, individually,
KELLI SCHAEFER, individually,
JOE CORSO, individually,
DIANE HEISEL, individually,
HEGIRA PROGRAMS, INC.,
CARELINK NETWORK, INC., and
MICHIGAN DEPARTMENT OF
HEALTH AND HUMAN SERVICES,

Defendants.

LAURENCE H. MARGOLIS (P69635)
Margolis Law, PC
Attorney for Plaintiff
214 South Main Street, Suite 202
Ann Arbor, MI 48104
(734) 994-9590
Email: Larry@lawinann Arbor.com

JAMES M. GALLAGHER (P73038)
James Gallagher PLLC
Attorney for Plaintiffs
214 S. Main St., Ste. 202
Ann Arbor, MI 48104
(734) 274-5090
jgallagher@jamesgallagherlaw.com

LOREN BLUM (P38557)
Law Offices of Christine Greig
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
(248)-223-0120
Fax: 603-334-9174
Loren.Blum@LibertyMutual.com

DEFENDANT HEGIRA PROGRAMS, INC.'S ANSWER TO COMPLAINT

NOW COMES THE DEFENDANT, Hegira Programs, Inc., by and through its attorneys, Law Offices of Christine Greig, by Attorney Loren Blum, and in answer to Plaintiffs' complaint, states as follows:

1. Neither admitted nor denied, for lack of information to plead more definitely.
2. Neither admitted nor denied, for lack of information to plead more definitely.
3. Neither admitted nor denied, for lack of information to plead more definitely.
4. Neither admitted nor denied, for lack of information to plead more definitely.
5. Neither admitted nor denied, for lack of information to plead more definitely.
6. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.
7. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.
8. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.
9. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.
10. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.
11. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.
12. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

13. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

14. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

15. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

16. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

17. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

18. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

19. Neither admitted nor denied, for lack of information to plead more definitely.

20. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

21. Neither admitted nor denied, for lack of information to plead more definitely.

22. Neither admitted nor denied, for lack of information to plead more definitely.

23. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

24. Neither admitted nor denied, for lack of information to plead more definitely.

25. Neither admitted nor denied, for the reason that the allegations do not pertain to this defendant.

26. Neither admitted nor denied, for lack of information to plead more definitely.

27. Neither admitted nor denied, for lack of information to plead more definitely.

28. Neither admitted nor denied, for lack of information to plead more definitely.

29. Neither admitted nor denied, for lack of information to plead more definitely.
30. Neither admitted nor denied, for lack of information to plead more definitely.
31. Neither admitted nor denied, for lack of information to plead more definitely.
32. Neither admitted nor denied, for lack of information to plead more definitely.
33. Neither admitted nor denied, for lack of information to plead more definitely.
34. Neither admitted nor denied, for lack of information to plead more definitely.
35. Neither admitted nor denied, for lack of information to plead more definitely.
36. Neither admitted nor denied, for lack of information to plead more definitely.
37. Neither admitted nor denied, for lack of information to plead more definitely.
38. Neither admitted nor denied, for lack of information to plead more definitely.
39. Neither admitted nor denied, for lack of information to plead more definitely.
40. Neither admitted nor denied, for lack of information to plead more definitely.
41. Neither admitted nor denied, for lack of information to plead more definitely.
42. Neither admitted nor denied, for lack of information to plead more definitely.
43. Neither admitted nor denied, for lack of information to plead more definitely.
44. Neither admitted nor denied, for lack of information to plead more definitely.
45. Neither admitted nor denied, for lack of information to plead more definitely.
46. Neither admitted nor denied, for lack of information to plead more definitely.
47. Neither admitted nor denied, for lack of information to plead more definitely.
48. Neither admitted nor denied, for lack of information to plead more definitely.
49. Neither admitted nor denied, for lack of information to plead more definitely.
50. Neither admitted nor denied, for lack of information to plead more definitely.
51. Neither admitted nor denied, for lack of information to plead more definitely.
52. Neither admitted nor denied, for lack of information to plead more definitely.
53. Neither admitted nor denied, for lack of information to plead more definitely.

54. Neither admitted nor denied, for lack of information to plead more definitely.
55. Neither admitted nor denied, for lack of information to plead more definitely.
56. Neither admitted nor denied, for lack of information to plead more definitely.
57. Neither admitted nor denied, for lack of information to plead more definitely.
58. Neither admitted nor denied, for lack of information to plead more definitely.
59. Neither admitted nor denied, for lack of information to plead more definitely.
60. Neither admitted nor denied, for lack of information to plead more definitely.
61. Neither admitted nor denied, for lack of information to plead more definitely.
62. Neither admitted nor denied, for lack of information to plead more definitely.
63. Neither admitted nor denied, for lack of information to plead more definitely.
64. Neither admitted nor denied, for lack of information to plead more definitely.
65. Neither admitted nor denied, for lack of information to plead more definitely.
66. Neither admitted nor denied, for lack of information to plead more definitely.
67. Neither admitted nor denied, for lack of information to plead more definitely.
68. Neither admitted nor denied, for lack of information to plead more definitely.
69. Neither admitted nor denied, for lack of information to plead more definitely.
70. Neither admitted nor denied, for lack of information to plead more definitely.
71. Neither admitted nor denied, for lack of information to plead more definitely.
72. Neither admitted nor denied, for lack of information to plead more definitely.
73. Neither admitted nor denied, for lack of information to plead more definitely.
74. Neither admitted nor denied, for lack of information to plead more definitely.
75. Neither admitted nor denied, for lack of information to plead more definitely.
76. Neither admitted nor denied, for lack of information to plead more definitely.
77. Neither admitted nor denied, for lack of information to plead more definitely.
78. Neither admitted nor denied, for lack of information to plead more definitely.

79. Neither admitted nor denied, for lack of information to plead more definitely.

80. Neither admitted nor denied, for lack of information to plead more definitely.

COUNT I: DEPRIVATION OF RIGHTS GUARANTEED BY THE CONSTITUTIONS

AND LAWS OF THE UNITED STATES AND THE STATE OF MICHIGAN

81. All previous answers given by defendant are hereby incorporated by reference, in response to the incorporated paragraphs listed by plaintiffs.

82. Neither admitted nor denied, for lack of information to plead more definitely.

83. Neither admitted nor denied, for lack of information to plead more definitely.

84. Neither admitted nor denied, for lack of information to plead more definitely.

85. Neither admitted nor denied, for lack of information to plead more definitely.

86. Neither admitted nor denied, for lack of information to plead more definitely.

87. Neither admitted nor denied, for lack of information to plead more definitely.

88. Neither admitted nor denied, for lack of information to plead more definitely.

89. Neither admitted nor denied, for lack of information to plead more definitely.

90. Neither admitted nor denied, for lack of information to plead more definitely.

91. Neither admitted nor denied, for lack of information to plead more definitely.

92. Neither admitted nor denied, for lack of information to plead more definitely.

93. Neither admitted nor denied, for lack of information to plead more definitely.

94. Neither admitted nor denied, for lack of information to plead more definitely.

95. Neither admitted nor denied, for lack of information to plead more definitely.

96. Neither admitted nor denied, for lack of information to plead more definitely.

97. Neither admitted nor denied, for lack of information to plead more definitely.

98. Neither admitted nor denied, for lack of information to plead more definitely.

99. Neither admitted nor denied, for lack of information to plead more definitely.

100. Neither admitted nor denied, for lack of information to plead more definitely, including subparts A-D.

101. Neither admitted nor denied, for lack of information to plead more definitely.

102. Neither admitted nor denied, for lack of information to plead more definitely.

103. Neither admitted nor denied, for lack of information to plead more definitely.

104. Neither admitted nor denied, for lack of information to plead more definitely.

105. Neither admitted nor denied, for lack of information to plead more definitely.

106. Neither admitted nor denied, for lack of information to plead more definitely.

107. Neither admitted nor denied, for lack of information to plead more definitely.

108. Neither admitted nor denied, for lack of information to plead more definitely.

109. Neither admitted nor denied, for lack of information to plead more definitely.

110. Neither admitted nor denied, for lack of information to plead more definitely.

111. Neither admitted nor denied, for lack of information to plead more definitely.

112. Neither admitted nor denied, for lack of information to plead more definitely.

113. Neither admitted nor denied, for lack of information to plead more definitely.

114. Neither admitted nor denied, for lack of information to plead more definitely.

115. Neither admitted nor denied, for lack of information to plead more definitely.

116. Neither admitted nor denied, for lack of information to plead more definitely.

117. Neither admitted nor denied, for lack of information to plead more definitely.

118. Neither admitted nor denied, for lack of information to plead more definitely, including subparts A-D.

119. Neither admitted nor denied, for lack of information to plead more definitely.

120. Neither admitted nor denied, for lack of information to plead more definitely.

121. Neither admitted nor denied, for lack of information to plead more definitely.

122. Neither admitted nor denied, for lack of information to plead more definitely.

123. Neither admitted nor denied, for lack of information to plead more definitely.
124. Neither admitted nor denied, for lack of information to plead more definitely.
125. Neither admitted nor denied, for lack of information to plead more definitely.
126. Neither admitted nor denied, for lack of information to plead more definitely.
127. Neither admitted nor denied, for lack of information to plead more definitely.
128. Neither admitted nor denied, for lack of information to plead more definitely.
129. Denied, because the allegations are untrue.
130. Denied, because the allegations are untrue.
131. Neither admitted nor denied, for lack of information to plead more definitely.

**COUNT II: DEPRIVATION OF RIGHTS GUARANTEED BY THE FOURTEENTH
AMENDMENT TO THE UNITED STATES CONSTITUTION AND TITLE II OF THE
AMERICANS WITH DISABILITIES ACT**

132. All previous answers given by defendant are hereby incorporated by reference, in response to the incorporated paragraphs listed by plaintiffs.
133. Neither admitted nor denied, for lack of information to plead more definitely.
134. Neither admitted nor denied, for lack of information to plead more definitely.
135. Neither admitted nor denied, for lack of information to plead more definitely.
136. Neither admitted nor denied, for lack of information to plead more definitely.
137. Denied, because the allegations are untrue.
138. Neither admitted nor denied, for lack of information to plead more definitely.
139. Neither admitted nor denied, for lack of information to plead more definitely.
140. Neither admitted nor denied, for lack of information to plead more definitely.
141. Neither admitted nor denied, for lack of information to plead more definitely.

WHEREFORE, Defendant prays for a judgment in its favor, of "no cause of action," dismissal of the complaint, together with awarding of costs, attorney fees, and all other expenses

incurred in the defense of this action so wrongfully brought, including subpart 1(a-b), and subpart 2(a-d); and subpart 3.

LAW OFFICES OF CHRISTINE GREIG

/s/ Loren Blum

BY: LOREN BLUM (P38557)
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
Loren.Blum@LibertyMutual.com
248-223-0120

Dated: June 6, 2018

STATE OF MICHIGAN
IN THE UNITED STATES DISTRICT COURT

DARRYL PELICHET and BONN WASHINGTON,

Plaintiffs,

Case No. 18-11385

Honorable Paul D. Borman

v.

NICK LYON, individually,
LISA MEDOFF, individually,
MARY CLAIRE SOLKY, individually
LAURIE ALBERT, individually,
HANUMAIAH BANDLA, individually,
CHARLES STERN, individually,
ARUNA BAVINENI, individually,
SHARON DODD-KIMMEY, individually,
CRAIG LEMMEN, individually,
KIMBERLY KULP-OSTERLAND,
individually,
LISA MARQUIS, individually,
MARTHA SMITH,
DAVE BARRY, individually,
KELLI SCHAEFER, individually,
JOE CORSO, individually,
DIANE HEISEL, individually,
HEGIRA PROGRAMS, INC.,
CARELINK NETWORK, INC., and
MICHIGAN DEPARTMENT OF
HEALTH AND HUMAN SERVICES,

Defendants.

LAURENCE H. MARGOLIS (P69635)
Margolis Law, PC
Attorney for Plaintiff
214 South Main Street, Suite 202
Ann Arbor, MI 48104
(734) 994-9590
Email: Larry@lawinannarbor.com

JAMES M. GALLAGHER (P73038)
James Gallagher PLLC
Attorney for Plaintiffs
214 S. Main St., Ste. 202
Ann Arbor, MI 48104
(734) 274-5090
jgallagher@jamesgallagherlaw.com

LOREN BLUM (P38557)
Law Offices of Christine Greig
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
(248)-223-0120
Fax: 603-334-9174
Loren.Blum@LibertyMutual.com

DEFENDANT HEGIRA PROGRAMS, INC.'S RELIANCE UPON JURY DEMAND

NOW COME THE DEFENDANT, Hegira Programs, Inc., by and through its attorneys, Law Offices of Christine Greig, by Attorney Loren Blum, and hereby rely upon the Jury Demand as made by the Plaintiffs in the case herein.

LAW OFFICES OF CHRISTINE GREIG

/s/ Loren Blum

BY: LOREN BLUM (P38557)
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
Loren.Blum@LibertyMutual.com
248-223-0120

Dated: June 6, 2018

STATE OF MICHIGAN
IN THE UNITED STATES DISTRICT COURT

DARRYL PELICHET, and
BONN WASHINGTON,

Plaintiffs,

Case No. 18-11385
Honorable Paul D. Borman

v.

NICK LYON, individually,
LISA MEDOFF, individually,
MARY CLAIRE SOLKY, individually
LAURIE ALBERT, individually,
HANUMAIAH BANDLA, individually,
CHARLES STERN, individually,
ARUNA BAVINENI, individually,
SHARON DODD-KIMMEY, individually,
CRAIG LEMMEN, individually,
KIMBERLY KULP-OSTERLAND,
individually,
LISA MARQUIS, individually,
MARTHA SMITH,
DAVE BARRY, individually,
KELLI SCHAEFER, individually,
JOE CORSO, individually,
DIANE HEISEL, individually,
HEGIRA PROGRAMS, INC.,
CARELINK NETWORK, INC., and
MICHIGAN DEPARTMENT OF
HEALTH AND HUMAN SERVICES,

Defendants.

LAURENCE H. MARGOLIS (P69635)
Margolis Law, PC
Attorney for Plaintiff
214 South Main Street, Suite 202
Ann Arbor, MI 48104
(734) 994-9590
Email: Larry@lawinannarbor.com

JAMES M. GALLAGHER (P73038)
James Gallagher PLLC
Attorney for Plaintiffs
214 S. Main St., Ste. 202
Ann Arbor, MI 48104

LOREN BLUM (P38557)
Law Offices of Christine Greig
Attorney for Defendant Hegira Programs
28411 Northwestern Hwy., Suite 640
Southfield, MI 48034
(248)-223-0120
Fax: 603-334-9174
Loren.Blum@LibertyMutual.com

(734) 274-5090
jgallagher@jamesgallagherlaw.com

PROOF OF SERVICE

STATE OF MICHIGAN)
)ss
COUNTY OF OAKLAND)

Tracee Rodriguez, being duly sworn on June 6, 2018, deposes and says that she served a copy of the attached Appearance and Notice of Entry of Appearance, Answer to Complaint, Affirmative Defenses and Reliance upon Jury Demand upon the above-named attorneys via PACER, electronic filing.

/s/ Tracee Rodriguez
Tracee Rodriguez